

Serial No.: 10/671,940  
Docket No.: 101-1007  
Response dated June 12, 2006  
Reply to the Office Action of March 3, 2006

## REMARKS

### I. Introduction

Applicants note with appreciation the courtesies extended by Examiner Huffman in the personal interview of June 8, 2006, in which the Examiner indicated that Applicants' arguments are reasonable and appear to be persuasive. In accordance with the Examiner's request, Applicants respectfully submit the following remarks addressing the points discussed in the Examiner interview conducted on June 8, 2006.

Claims 1-39 are pending in the application. No claims have been amended, cancelled, or newly added. In view of the following remarks, reconsideration and allowance of all the pending claims is respectfully requested.

### II. Claim Objections

Claim 9 has been objected to as containing informalities. In particular, the Examiner has objected to the language as being "not clear." See Final Office Action of March 3, 2006 page 2, item 2.

The Examiner previously applied the same objection at page 2, item 2 of the Office Action of November 2, 2005, and, in response to this objection, Applicants pointed out at page 9 of the Amendment dated December 20, 2005 that "the Examiner's interpretation...is a correct interpretation of the claim language" and that "the claim language as recited in claim 9 is sufficiently clear and definite to meet the requirements of 35 U.S.C. §112."

However, in the Final Office Action of March 3, 2006, the Examiner maintains that:

while the examiner agrees [that the claim is sufficiently clear to meet the requirements of 35 U.S.C. 112], the examiner maintains the objection and requests further clarification of the claim language. See Final Office Action of March 3, 2006 page 2, item 2.

Thus, the Examiner apparently acknowledges that the claim language is clear, definite, and complies with §112, yet the Examiner still objects to the claim language and requests

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clarification. Applicants respectfully point out that the claim language objected to by the Examiner is a definite and clear meaning in light of FIGS. 5, 7B, 9A, 9B, and 9C. Additionally, given the fact that the Examiner has agreed that the claim language is “sufficiently clear to meet the requirements of 35 U.S.C. 112,” there are no proper grounds which would sustain the Examiner’s objection to this claim language as allegedly being “not clear.” Accordingly, Applicants respectfully submit that the Examiner’s objection to this language in claim 9 is improper, and should be withdrawn.

### **III. Rejections under 35 USC §102**

#### **A. Rejection under §102 based on Matsuhashi**

Claims 1-11, 25-29, 31, and 32 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,997,129 to Matsuhashi. Applicants traverse this rejection for at least the following reasons.

##### *i. Claims 1-11*

At pages 3-4, item 4 of the Final Office Action of March 3, 2006, the Examiner alleges that:

“Matsuhashi discloses...first and second support beams (fig. 8, element 214) extending from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction (dividing the ink collector in half, a first half is the half in the paper feed direction, while a second half is the half in the direction opposite the paper feed direction, thus it can be seen that each support beam extends in both directions)...”

Applicants submit that Matsuhashi is directed to an excess ink capturing mechanism 211 having guide ribs 214 for guiding recording paper over a reservoir 212. See Matsuhashi col. 10, lines 22-33 and FIG. 8. Matsuhashi’s excess ink capturing mechanism 211 includes a bottom plate 212a and side walls 212b, 212c, 212d, and 212e rising from the periphery of the bottom plate 212a. The Examiner relies on the guide ribs 214 shown in Matsuhashi as allegedly being equivalent to “support beams,” as recited in independent claim 1 of Applicants’ invention. However, it is evident from FIG. 8 of Matsuhashi that the guide ribs 214 protrude from the

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bottom plate 212a without contacting the side walls 212b, 212c, 212d, and 212e of the reservoir 212. Thus, the guide ribs 214 of Matsuhashi's excess ink capturing mechanism 211 do not extend from the side walls 212b, 212c, 212d, and 212e of the reservoir 212. Moreover, the guide ribs 214 shown in Matsuhashi only extend upward from a center portion of the bottom plate 212a of the reservoir 212. Since the guide ribs 214 of Matsuhashi's excess ink capturing mechanism 211 do not extend from the side walls 212b, 212c, 212d, and 212e of the reservoir 212, the guide ribs 214 are not the same as "first and second support beams extending from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction, respectively . . .," as recited in independent claim 1 of Applicants' invention. Accordingly, Applicants respectfully submit that Matsuhashi fails to disclose each element as recited in independent claim 1 of Applicants' invention.

Furthermore, in the 1st paragraph of the "Response to Arguments" section on page 15, item 9 of the Final Office Action of March 3, 2006, the Examiner states that: "... surface 212a is a wall with portions and according to this interpretation, Matsuhashi discloses the claimed invention."

However, Applicants respectfully submit that this statement by the Examiner does not address the claim language of independent claim 1, as recited. Applicants are not claiming "a wall with portions," as alleged by the Examiner. Instead, Applicants' invention, as recited in independent claim 1, is directed to "first and second wall portions [of the ink collector] to define a space to collect ink" and "first and second support beams extending from the first and second wall portions of the ink collector..." Thus, the Examiner's response is not complete, since the Examiner's statements do not describe how the bottom plate 212a could possibly "define a space to collect ink," as recited in independent claim 1 of Applicants' invention.

Applicants further submit that the Examiner's position is not supported by Matsuhashi, since the bottom plate 212a shown in FIG. 8 does not have "first and second wall portions to define a space to collect ink," as recited in independent claim 1. Instead, as set forth above, the space in the ink reservoir 212 shown in FIG. 8 of Matsuhashi is enclosed by the side walls 212b, 212c, 212d, and 212e. However, the bottom plate 212a does not "define a space to collect ink,"

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thus the bottom plate 212a is not “first and second wall portions,” as recited in independent claim 1.

Applicants further submit that the bottom plate 212a shown in Matsuhashi is not “a wall portion,” as recited in independent claim 1 of Applicants’ invention, since the bottom portion is a horizontal surface and a horizontal surface cannot define a space.

Thus, Applicants respectfully submit that the bottom plate 212 shown in FIG. 8 of Matsuhashi does not “define” the “space” of the ink reservoir 212, as recited in independent claim 1. Since the bottom plate 212a shown in FIG. 8 simply cannot be construed as defining “a space to collect ink” under any type of interpretation, Matsuhashi fails to disclose, among other things, “an ink collector positioned under paper to correspond to the nozzle unit and having first and second wall portions to define a space to collect ink,” as recited in independent claim 1. Accordingly, the Examiner’s position is not supported.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as contained in the...claim.” Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). “The elements must be arranged as required by the claim...” In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Further, in the event that the Office Action is relying on the theory of inherency in any manner, “the Examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied art.” Ex parte Levy, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis in original). See also MPEP 2112. Accordingly, since Matsuhashi does not explicitly or inherently disclose every element as recited in independent claim 1, Matsuhashi cannot be properly used to reject independent claim 1 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 1 is allowable over Matsuhashi, and withdrawal of this rejection is earnestly solicited.

Regarding claims 2-11, it is respectfully submitted that for at least the reasons that each of claims 2-11 depends from allowable independent claim 1, and therefore contain each of the

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features as recited in this claim, claims 2-11 are therefore also patentable over Matsuhashi. Accordingly, withdrawal of the rejection of these claims is also earnestly solicited.

*ii. Claims 25-29 and 31*

As set forth above in the discussion of independent claim 1, it is evident from FIG. 8 of Matsuhashi that the guide ribs 214 protrude from the bottom plate 212a within the reservoir 212 without contacting the side walls 212b, 212c, 212d, and 212e thereof. Thus, the guide ribs 214 shown in Matsuhashi only extend upward from a center portion the bottom plate 212a in the reservoir 212, and the guide ribs 214 do not extend over the reservoir 212. Since the guide ribs 214 of Matsuhashi's excess ink capturing mechanism 211 do not extend over the reservoir 212, the guide ribs 214 are not the same as "a plurality of first support beams extending over the space at an upper portion of the ink collector..." and "a plurality of second support beams extending over the space at an upper portion of the ink collector...", as recited in independent claim 25 of Applicants' invention.

However, in the 2<sup>nd</sup> paragraph of the "Response to Arguments" section at page 15, item 9 of the Final Office Action of March 3, 2006, the Examiner states that "Matsuhashi discloses this limitation since the ribs extend over the space at an upper portion, which may be any portion on the upper half of the ink collector." Applicants submit that the Examiner's interpretation of Matsuhashi is inconsistent with the claim language, as recited in independent claim 25. The Examiner apparently equates the language "extending over the space at an upper portion" with the guide ribs 214 shown in FIG. 8 of Matsuhashi, which extend upward in the space of the ink reservoir 212 to be level with the sidewalls 212b, 212c, 212d, and 212e of the ink reservoir 212 at a point in the center of the ink reservoir 212. Referring to FIG. 8 of Matsuhashi, Applicants submit that there is no interpretation of Matsuhashi that can read on the claim language "extending over the space at an upper portion." The guide ribs 214 simply cannot be construed as "extending over the space at an upper portion," as recited in independent claim 25. Therefore, the Examiner's position is not supported, and Matsuhashi fails to disclose, among other things, "a plurality of first support beams extending over the space at an upper portion of the ink collector..." and "a plurality of second support beams extending

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over the space at an upper portion of the ink collector...,” as recited in independent claim 25 of Applicants’ invention.

With regard to the features “first beams...to support the printing medium at a printing medium feed side...and...second beams...to support...the printing medium at a printing medium discharge side...,” the Examiner asserts that

“... the feed side is the side upstream from the center or the collector and the discharge side is the side downstream from the center of the collector. Since the beams protrude from the center region, any one of the beams may be said to be on the feed side or the discharge side.” See “Response to Arguments” section of the Final Office Action of March 3, 2006 at page 16, 3<sup>rd</sup> paragraph.

Applicants respectfully submit that this interpretation contradicts itself. That is, the Examiner acknowledges that “the beams protrude from the center region,” yet the Examiner then maintains that “the beams may be said to be on the feed side or the discharge side.” Since these statements are technically inconsistent, the Examiner’s position is not supported by Matsuhashi. Furthermore, since the guide ribs 214 would only support the printing medium at “the center portion,” (i.e., not the printing medium feed side or the printing medium discharge side), Matsuhashi fails to disclose, among other things, “first beams...to support the printing medium at a printing medium feed side...and...second beams...to support...the printing medium at a printing medium discharge side...,” as recited in independent claim 25 of Applicants’ invention.

Additionally, as set forth above in the discussion of the Examiner’s statements in the 1st paragraph of the “Response to Arguments” section of the Final Office Action of March 3, 2006, the bottom plate 212a does not “define” the space in the ink reservoir 212, as recited in independent claim 25. Thus, contrary to the Examiner’s position, the bottom plate 212a cannot be construed as “first and second wall portions spaced-apart from each other to define a space to collect ink from the printing medium,” as recited in independent claim 25. Accordingly, Applicants respectfully submit that Matsuhashi fails to disclose each element as recited in independent claim 25 of Applicants’ invention. Since Matsuhashi does not explicitly or inherently disclose every element as recited in independent claim 25, Matsuhashi cannot be properly used to reject independent claim 25 under 35 U.S.C. § 102. Therefore, it is respectfully

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submitted that independent claim 25 is allowable over Matsuhashi, and withdrawal of this rejection is earnestly solicited.

Regarding claims 26-29 and 31, it is respectfully submitted that for at least the reasons that each of claims 26-29 and 31 depends from allowable independent claim 25, and therefore contain each of the features as recited in this claim, claims 26-29 and 31 are therefore also patentable over Matsuhashi. Accordingly, withdrawal of the rejection of these claims is also earnestly solicited.

*iii. Claim 32*

At pages 8 and 9 of the Final Office Action of March 3, 2006, the Examiner alleges that Matsuhashi discloses “a platen along which the printing medium is conveyed (fig. 8); an ink collector...including a space portion positioned beneath an upper surface of the platen (205) to collect excess ink...a plurality of first support beams (214, even) disposed within the space portion at a printing medium feeding side...and a plurality of second support beams (214, odd) disposed within the space portion at a printing medium discharge side...”

As set forth above in the discussion of independent claim 1, Matsuhashi is directed to an excess ink capturing mechanism 211 having guide ribs 214 for guiding recording paper over a reservoir 212. See Matsuhashi col. 10, lines 22-33 and FIG. 8. Matsuhashi's excess ink capturing mechanism 211 includes a bottom plate 212a and side walls 212b, 212c, 212d, and 212e rising from the periphery of the bottom plate 212a. The Examiner again relies on the guide ribs 214 shown in Matsuhashi as allegedly being the same as “a plurality of first support beams” and “a plurality of second support beams,” as recited in independent claim 32 of Applicants' invention. However, it is evident from FIG. 8 of Matsuhashi that the guide ribs 214 protrude from a center portion of the bottom plate 212a away from the side walls 212b, 212c, 212d, and 212e of the reservoir 212. That is, none of Matsuhashi's guide ribs 214 are disposed at a printing medium feeding side of the reservoir 212, and none of Matsuhashi's guide ribs 214 are disposed at printing medium discharge side of the reservoir 212, since the guide ribs 214 are not disposed at any side of the reservoir 212. See Matsuhashi FIG. 8. Thus, the guide ribs 214 shown in Matsuhashi are not the same as “a plurality of first support beams disposed within the space portion at a printing medium feed side of the ink collector...” and “a plurality of second

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support beams disposed within the space portion at a printing medium discharge side of the ink collector ....," as recited in independent claim 32 of Applicants' invention, since the guide ribs 214 shown in Matsuhashi are not disposed near any of the sides of the excess ink capturing mechanism 211.

Furthermore, as set forth above in the discussion of the Examiner's statements that "Since the beams protrude from the center region, any one of the beams may be said to be on the feed side or the discharge side" (See "Response to Arguments" section of the Final Office Action of March 3, 2006 at page 16, 3<sup>rd</sup> paragraph), Applicants respectfully submit that this interpretation contradicts itself. That is, the Examiner acknowledges that "the beams protrude from the center region," yet the Examiner then maintains that "the beams may be said to be on the feed side or the discharge side." Applicants respectfully submit that these statements are technically inconsistent, and therefore, the Examiner's position is improper.

Additionally, since all of the guide ribs 214 are disposed in the center portion of the bottom plate 212a, it necessarily follows that the guide ribs 214 cannot be construed as being "disposed...at a printing medium feed side" and "disposed...at a printing medium discharge side," as recited in independent claim 32.

In fact, it is evident that independent claim 32 of Applicants' invention recites two types of support beams, namely, "first support beams" that are "disposed...at a printing medium feed side" and "second support beams" that are "disposed...at a printing medium discharge side," whereas the guide ribs 214 shown in FIG. 8 of Matsuhashi are **all** the same. Thus, the guide ribs 214 are not the same as "first support beams" and "second support beams," as recited in independent claim 32.

Accordingly, Applicants respectfully submit that Matsuhashi fails to disclose, among other things, "a plurality of first support beams disposed within the space portion at a printing medium feed side of the ink collector extending in a printing medium feed direction to support the printing medium above the space portion" and "a plurality of second support beams disposed within the space portion at a printing medium discharge side of the ink collector and extending in an opposite direction to the printing medium feed direction, the plurality of second support beams being overlapped by the plurality of first support beams to support the printing medium during feeding thereof between the ink head and the ink collector," as recited in

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independent claim 32 of Applicants' invention.

Accordingly, since Matsuhashi does not explicitly or inherently disclose every element as recited in independent claim 32, Matsuhashi cannot be properly used to reject independent claim 32 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 32 is allowable over Matsuhashi, and withdrawal of this rejection is earnestly solicited.

**B. Rejection under §102 based on Ohashi**

Claims 1-9, 11, 25-29, 31, and 32 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2002/0089564 to Ohashi. Applicants respectfully traverse this rejection for at least the following reasons.

*i. Claims 1-9 and 11*

At page 9, item 5 of the Final Office Action of March 3, 2006, the Examiner alleges that Ohashi discloses "an ink collector (fig. 7, elements 11 and 12) positioned under paper to correspond to the nozzle unit and having first and second wall portions to define a space to collect ink (fig. 7, element 11 is a wall which has first and second portions which define a space to collect ink, any two distinct points on element 11 are first and second wall portions)..."

Applicants submit that Ohashi is directed to an inkjet recording apparatus including a platen 11 having rows of ribs 11a and 11b disposed thereon, and a platen ink absorber 12 disposed to surround the ribs of the rib rows 11a and 11b. See Ohashi paragraphs [0078] and [0079] and FIGS. 7A and 7B. However, it is evident from FIGS. 7A and 7B of Ohashi that device shown therein does not have "an ink collector...having first and second wall portions to define a space to collect ink," as recited in independent claim 1 of Applicants' invention.

The Examiner relies on the platen 11 shown in FIGS. 7A and 7B of Ohashi as allegedly being equivalent to "first and second wall portions to define a space to collect ink." However, Applicants respectfully submit that the device shown in FIGS. 7A and 7B of Ohashi does not have any wall portions that "define a space to collect ink." In fact, as illustrated in Ohashi, the platen 11 remains open on all sides and is not enclosed by any type of wall or wall portion.

Applicants further submit that Ohashi's platen 11 itself is not "first and second wall portions," since the platen 11 does not "define a space to collect ink," as recited in independent

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claim 1 of Applicants' invention. In contrast with the present invention as recited in independent claim 1, Ohashi's platen 11 is a single part that supports ribs rows 11a and 11b and the ink absorber 12. Additionally, the ink in Ohashi's device is collected by the ink absorber 12, which is also open on all sides and is not disposed in "a [defined] space" let alone "a space" defined by the platen 11. See Ohashi FIGS. 4 to 7B.

Applicants further submit that the platen 11, itself, is not "first and second wall portions," since the bottom portion of the platen 11 is a horizontal surface, and therefore is not "a wall portion," as recited in independent claim 1. Thus, contrary to the Examiner's assertion that "element 11 is a wall," Applicants submit that the platen 11 shown in FIGS. 7A and 7B is arranged horizontally and is not a "wall" or "wall portion," as recited in independent claim 1 of Applicants' invention.

Accordingly, Applicants submit that the platen 11 shown in FIGS. 4 to 7B, Ohashi's platen 11 cannot be construed as "first and second wall portions to define a space to collect ink," as recited in independent claim 1 of Applicants' invention.

Since Ohashi does not explicitly or inherently disclose every element as recited in independent claim 1, Ohashi cannot be properly used to reject independent claim 1 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 1 is allowable over Ohashi, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Regarding claims 2-9 and 11, it is respectfully submitted that for at least the reasons that each of claims 2-9 and 11 depends from allowable independent claim 1, and therefore contain each of the features as recited in this claim, claims 2-9 and 11 are therefore also patentable over Ohashi. Accordingly, withdrawal of the rejection and allowance of these claims are also earnestly solicited.

*ii. Claims 25-29 and 31*

Independent claim 25 recites similar features as those recited in independent claim 1, for example, "an ink collector having first and second wall portions spaced-apart from each other to define a space." Applicants respectfully submit that Ohashi does not disclose each of the features as recited in independent claim 25, at least for the same reasons set forth above with respect to independent claim 1.

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Accordingly, since Ohashi does not explicitly or inherently disclose every element as recited in independent claim 25, Ohashi cannot be properly used to reject independent claim 25 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 25 is allowable over Ohashi, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Regarding claims 26-29 and 31, it is respectfully submitted that for at least the reasons that each of claims 26-29 and 31 depends from allowable independent claim 25, and therefore contain each of the features as recited in this claim, claims 26-29 and 31 are therefore also patentable over Ohashi. Accordingly, withdrawal of the rejection and allowance of these claims are also earnestly solicited.

*iii. Claim 32*

At page 13 of the Final Office Action, the Examiner alleges that Ohashi discloses "a platen (11) along which the printing medium is conveyed; an ink collector (12) including a space portion positioned beneath an upper surface of the platen to collect excess ink from the printing medium (fig. 7)..."

However, Applicants respectfully point out that, as shown in FIGS. 7A and 7B of Ohashi, the platen 11 clearly does not have "a space portion beneath an upper surface" thereof "to collect excess ink from the printing medium," as recited in independent claim 32 of Applicants' invention. In contrast with the present invention as recited in claim 32, Ohashi's ink absorber 12, which collects ink, is disposed **above** the upper surface of the platen 11 (i.e., the opposite of "beneath the upper surface"). Thus, Applicants respectfully submit that Ohashi fails to disclose, among other things, "a platen along which the printing medium is conveyed" and "an ink collector including a space portion positioned beneath an upper surface of the platen to collect excess ink from the printing medium," as recited in independent claim 32.

Accordingly, since Ohashi does not explicitly or inherently disclose every element as recited in independent claim 32, Ohashi cannot be properly used to reject independent claim 32 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 32 is allowable over Ohashi, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

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#### **IV. Rejections under 35 USC §103**

Claim 30 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Matsuhashi in view of U.S. Patent No. 6,158,840 to Kobayashi et al. Applicants respectfully traverse this rejection for at least the following reason.

Claim 30 indirectly depends from independent claim 25, and therefore includes the features as recited in independent claim 25. The Examiner acknowledges that Matsuhashi does not disclose the space portion comprising a felt to absorb ink drops caught by the space portion. See Final Office Action of March 3, 2006 page 14, item 7. However, the Examiner relies on Kobayashi et al. to allegedly teach or suggest the features admittedly lacking in Matsuhashi. See Final Office Action of March 3, 2006 page 14, item 7. Applicants respectfully submit that even if Kobayashi et al. did in fact describe felt to absorb ink drops in the space portion, as alleged by the Examiner, Matsuhashi and Kobayashi et al., either separately or in combination, fail to teach or suggest “an ink collector having first and second wall portions spaced-apart from each other to define a space to collect ink ...,” “a plurality of first support beams extending over the space at an upper portion of the ink collector in a printing medium feed direction to support the printing medium at a printing medium feed side of the ink collector” and “a plurality of second support beams extending over the space at an upper portion of the ink collector in an opposite direction to the printing medium feed direction ...,” as recited in independent claim 25 of Applicants’ invention. Accordingly, claim 30 is patentable over the references relied upon by the Examiner, and withdrawal of the rejection is earnestly solicited.

Claim 30 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Ohashi in view of Kobayashi et al. Applicants respectfully traverse this rejection for at least the following reason.

Claim 30 indirectly depends from independent claim 25, and therefore includes the features as presently recited in independent claim 25. The Examiner acknowledges that Ohashi does not disclose the space portion comprising a felt to absorb ink drops caught by the space portion. See Final Office Action of March 3, 2006 pages 14-15, item 8. However, the Examiner relies on Kobayashi et al. to allegedly teach or suggest the features admittedly lacking in Ohashi. See Final Office Action of March 3, 2006 pages 14-15, item 8. Applicants respectfully

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submit that even if Kobayashi et al. did in fact describe felt to absorb ink drops in the space portion, as alleged by the Examiner, Ohashi and Kobayashi et al., either separately or in combination, fail to teach or suggest "an ink collector having first and second wall portions spaced-apart from each other to define a space," as recited in independent claim 25. Accordingly, claim 30 is patentable over the references relied upon by the Examiner, and withdrawal of the rejection and allowance of this claim are earnestly solicited.

#### V. Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

STANZIONE & KIM, LLP

By:   
Daniel E. Valencia  
Registration No. 56,463

Dated: June 12, 2006  
919 18<sup>th</sup> St., NW, Suite 440  
Washington, DC 20006  
Telephone: (202) 775-1900  
Facsimile: (202) 775-1901